

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

LAUREN HOWIE LAUR,

Case No: 14C0027

Plaintiff,

v.

CITY OF MEQUON, CITY OF MEQUON
POLICE DEPARTMENT (*sic*), The Estate of
TYLER GAIDISH (*sic*) and MICHAEL
KRANZ,

Defendants.

DEFENDANTS' REQUESTED *VOIR DIRE*

COME NOW the defendants herein and ask that the court make the following inquiries of the jury venire:

1. Statement of the case. (A very brief, concise description of the plaintiff(s)' claims and the defendant(s)' defenses.)

Has any one of you ever heard of this case before today? How? When? When you heard about it, did you form any opinion concerning the case? Do you believe that your ability to serve impartially as a juror in this case has been affected by what you have heard about it?

2. The trial of this case will begin June 29 and will last 3 days. Is there any one of you who would be unable to serve as a juror during this time?
3. Ask counsel to stand and tell the jury where they practice and with whom. Ask panel whether anyone knows counsel or their associates or partners.
4. Ask counsel to introduce the parties. Ask panel whether anyone knows any of the parties.
5. Question to each prospective juror.
 - a. Please stand up and tell us about yourself.
 - b. Name, age, and city or town of residence.

- c. Marital status and number of children, if any.
 - d. Current occupation (former if retired).
 - e. Current (or former) occupation of your spouse or domestic partner.
 - f. Any military service, including branch, rank and approximate date of discharge.
 - g. How far you went in school and major areas of study, if any.
 - h. Memberships in any groups or organizations.
 - i. Hobbies and leisure-time activities.
 - j. Favorite types of reading material.
 - k. Favorite types of television shows.
 - l. Bumper stickers on your car.
6. Question to panel regarding prior experience with court proceedings:
- a. Have any of you ever been a party to a lawsuit? Describe circumstances.
 - b. Have any of you ever been a witness in a lawsuit?
 - c. How many of you have served previously on a jury?
 - d. Of those of you who have sat on a jury, were you ever the foreperson on a jury? Describe your experience.
 - e. Do any of you know any of the other persons on the jury panel?
7. Question to panel on police opinions:

In this case plaintiff alleges that her Constitutional rights were violated because a police officer took a photo of a tattoo on her hip when she was being booked for drunk driving

- a. Does anyone have any bad feelings towards police officers?
- b. Does anyone feel that they have ever been mistreated by a police officer?
- c. The defendants are from the City of Mequon Police Department.

Does anyone have any bad feelings about the City of Mequon?

Does anyone have any bad feelings about the Mequon Police Department?

d. Does anyone have a tattoo? Where? What of?

8. Question to panel. At the end of the case I will give you instructions that will govern your deliberations. You are required to follow those instructions, even if you do not agree with them.
- Is there any one of you who would be unable or unwilling to follow the instructions?
9. Question to panel. Do you know of any reason whatsoever why you could not sit as a trial juror with absolute impartiality to all the parties in this case?

Dated: June 9, 2015

By: _____/S/_____

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